

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

ANNE SMITHERS, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 1:18cv676 (TSE/IDD)
	)	
FRONTIER AIRLINES, INC.	)	
	)	
Defendant.	)	
	)	

**CONSENT MOTION FOR ENTRY OF PROTECTIVE ORDER**

COME NOW the Plaintiffs Anne Smithers and Henry Wiley (collectively, “Plaintiffs”), and Defendant Frontier Airlines, Inc. (“Defendant”) (collectively, the “Parties”), in the above-styled matter, and hereby move this Court for entry of the Stipulated Protective Order (“Protective Order”) submitted herewith. The Parties agree to the entry of the Protective Order and **to waiver of a hearing on this Consent Motion.** The Protective Order is necessary to ensure the confidentiality of confidential, proprietary, and/or trade secret information that may be disclosed during the course of discovery in this matter.

WHEREFORE, for good cause shown, the Parties respectfully request that this Court grant this Consent Motion.

Respectfully submitted this 13<sup>th</sup> day of March, 2019

<p><u>/s/ ELAINE CHARLSON BREDEHOFT</u> Elaine Charlson Bredehoft, VSB No. 23766 Adam S. Nadelhaft, VSB 91717 David E. Murphy, VSB 90938 Charlson Bredehoft Cohen &amp; Brown, P.C. 11260 Roger Bacon Drive, Suite 201 Reston, VA 20190 (703) 318-6800 Telephone (703) 318-6808 Facsimile <a href="mailto:ebredehoft@cbcblaw.com">ebredehoft@cbcblaw.com</a> <a href="mailto:anadelhaft@cbcblaw.com">anadelhaft@cbcblaw.com</a> <a href="mailto:dmurphy@cbcblaw.com">dmurphy@cbcblaw.com</a></p> <p>Stephen J. Fearon (Admitted <i>Pro Hac Vice</i>) Bartholomew J. Banino (Admitted <i>Pro Hac Vice</i>) Allison M. Surcouf (Admitted <i>Pro Hac Vice</i>) Condon &amp; Forsyth LLP 7 Times Square New York, NY 10036 (212) 490-9100 Telephone (212) 370-4453 Facsimile <a href="mailto:SFearon@condonlaw.com">SFearon@condonlaw.com</a> <a href="mailto:bbanino@condonlaw.com">bbanino@condonlaw.com</a> <a href="mailto:asurcouf@condonlaw.com">asurcouf@condonlaw.com</a></p> <p><i>Counsel for Defendant, Frontier Airlines, Inc.</i></p>	<p><u>/s/ WILLIAM T. WOODROW III</u> William T. Woodrow III, Esquire Virginia State Bar No. 88122 Thatcher A. Stone, Esq. (<i>Pro Hac Vice</i>) 250 West Main Street, Suite 201 Lewis &amp; Clark Plaza Charlottesville, VA 22903 Stone &amp; Woodrow LLP <a href="mailto:will@stoneandwoodrowlaw.com">will@stoneandwoodrowlaw.com</a> (855) 275-7378 (p)</p> <p><i>Counsel for Plaintiffs</i></p>
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of March, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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